

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Michelle Washington,
DEBTOR(S)

CASE NO: 20-03482-dd

CHAPTER 13

Objection to Motion for reconsideration

Debtor replying to Motion for reconsideration will show as follows:

1. That Titlemax objection as noticed re objection to confirmation of Debtor's plan is not applicable to relief Debtor was requesting.
2. That Creditor herein conflates debt and claim. Section 1322(b)(2) allows the Debtor to treat / modify the rights of holders of secured claims.
3. That claim is defined in section 101(5) of the Bankruptcy code as a right to payment whether liquidated , unliquidated, equitable, reduced to a judgment or not, etc.
4. That the term claim is therefore much broader than debt in the bankruptcy context..
5. That case law is consistent with the above.

Date: September 24, 2021

/s/Paul Held
Signature of Attorney/*Pro Se* Debtor

Paul L Held
Typed Printed Name

136 N Main Street Sumter SC 29151-0521
Address/Telephone/Facsimile/E-mail

1809
District Court ID Number